

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

EARL CRUMPE, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

TD BANK, N.A.,

Defendants.

Civil Action No. 1:25-cv-01566

**STIPULATION AND CONSENT ORDER EXTENDING DEFENDANT TD BANK, N.A.'S
TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

WHEREAS, Plaintiff Earl Crumpe (“**Plaintiff**”) initiated the above-captioned action against Defendant TD Bank, N.A. (“**TD Bank**”) by way of Complaint filed on February 28, 2025 in the United States District Court of the District of New Jersey, Docket No. 1:25-cv-01566 (the “**Action**”);

WHEREAS, TD Bank was served with the Summons and Complaint in the Action on March 6, 2025;

WHEREAS, TD Bank’s time to answer, move or otherwise respond to the Complaint is March 27, 2025;

WHEREAS, TD Bank has recently retained undersigned counsel to represent it in this matter;

WHEREAS, the parties engaged in preliminary discussions, and agreed to extend TD Bank’s time to answer, move or otherwise respond to the Complaint by thirty (30) days so that counsel may investigate the allegations in the Complaint and familiarize himself with the facts of this case to comply with the Court’s pre-motion procedures; and

WHEREAS, this is the first request for extension, it is not being sought to delay litigation, and will not prejudice the parties.

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties, subject to approval and entry by the Court, that TD Bank's time to answer, move or otherwise respond to the Complaint is extended by thirty (30) days, from March 27, 2025 to April 26, 2025.¹

BRONSTEIN, GEWIRTZ & GROSSMAN, LLC
Attorneys for Plaintiff Earl Crumpe

By: 
Neil Grossman, Esq.

DUANE MORRIS LLP
Attorneys for Defendant TD Bank, N.A.

By: 
Michael S. Zullo Esq.

Dated: March 26, 2025

Dated: March 26, 2025

SO ORDERED:

HON.

¹ Pursuant to Federal Rule of Civil Procedure 6, "[w]hen the period is stated in days . . . include the last day of the period but if the last day is a Saturday, Sunday, or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday." Fed. R. Civ. P. 6(1)(C). Because thirty days falls on Saturday, April 26, 2025, TD Bank shall have until Monday, April 28, 2025, to respond to the Complaint.